

discuss plans for a Native American meeting in Washington during the October NFC conference. By Aug. 28, however, plans were made to invite tribal leaders to a DNC Issues Conference and dinner with Vice President Gore on Sept. 11 in Washington, D.C.⁵⁴³

On a parallel course, O'Connor remained in contact with the DNC about the threat of litigation through September 1995, when the suit was actually filed. During that time frame, records reflect he spoke with Mercer at least three times about Hudson, and that he called Sullivan about the issue at least once. During this time, O'Connor also spoke with Fowler, both about the threat of a Hudson lawsuit and about fund-raising from the Indians. Fowler's Aug. 25 finance call sheet advised him to call O'Connor, providing as "Background" nothing more than: "Money from the Native Americans."⁵⁴⁴ Notes on that same document reflect that Fowler placed a call to O'Connor on Aug. 28, but suggest they did not speak on that date. O'Connor's time billing records reflect that the two spoke on Aug. 15 regarding another O'Connor client,⁵⁴⁵ and then again on Sept. 6 regarding Fowler's Aug. 29 meeting with Ron Platt and the threat of a suit against Fowler and Ickes over Hudson. Neither entry reflects discussion of fund-raising from the Indians. However, Fowler made undated notes during this time frame which he believes correspond to his initial discussion with O'Connor about the second O'Connor client who was seeking DNC assistance with the White House. Fowler's notes reflect that during this

⁵⁴³Crain prepared a memo for Fowler dated Aug. 28 detailing his Indian cultivation efforts since June 1995. In it, Crain noted that some of the Native American leaders who had offered to help the DNC reach out to tribal leaders across the country included Berger's contacts, NIGA's Chairman, Pequot Chairman Hayward, and Gover and Stetson.

⁵⁴⁴Memorandum from Ari Swiller to Donald Fowler, Aug. 25, 1995.

⁵⁴⁵*See* n. 267, *supra*.